

Exhibit B – Exemplary Claim Chart

U.S. Patent No. US 8,856,221 v. Kaltura

Exhibit B – Exemplary Claim Chart

1. Claim Chart

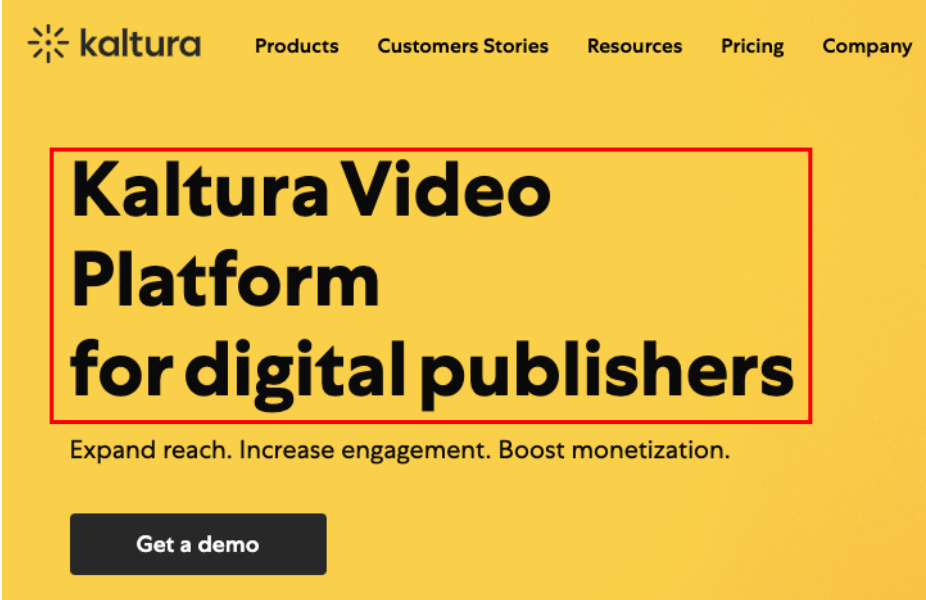
Claim	Analysis
<p>[7.P] A method for storing media content and delivering requested media content to a consumer device, the method comprising:</p>	<p>Kaltura (“Company”) performs and/or induces others to perform a method for storing media content and delivering requested media content to a consumer device.</p> <p>This element is infringed literally, or in the alternative, under the doctrine of equivalents.</p> <p>For example, Company provides a cloud-based, open-source video platform that allows publishers to add (“storing media content”) videos on a website. Further, it features a Transactional Video-on-demand (TVOD) model, which sells or rents publisher-owned videos to users/customers such that the videos are streamed or stored on a user’s device (“delivering requested media content to a consumer device”) such as desktop, smartphones, and smart TVs.</p>  <p>Source: https://corp.kaltura.com/video-platform-for-publishers/</p>

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High-quality video for live & VOD

Partnering with the world's most prominent brands, Kaltura's video platform helps digital publishers, broadcasters, and media and entertainment companies grow their audience and business at scale.

Kaltura helps you to:

- Add video to your website: on-demand, live, linear channels, or playlists
- Reach your audience on any device
- Increase ad viewability and capture every ad impression
- Easily integrate with ad -servers and analytics tools
- Expand your reach with syndication to social networks and more
- Introduce subscription plans to further grow your business
- Engage directly with viewers with your own D2C imprint

Source: <https://corp.kaltura.com/video-platform-for-publishers/>

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	<div data-bbox="907 256 966 315" data-label="Image"></div> <div data-bbox="567 350 1306 397" data-label="Section-Header">Simplified distribution and storage</div> <div data-bbox="411 433 1459 539" data-label="Text"> <p>A one-stop-shop for all your video operations, including storage and CDN services.</p> </div> <div data-bbox="405 553 1220 586" data-label="Text"> <p>Source: https://corp.kaltura.com/video-platform-for-publishers/</p> </div> <div data-bbox="747 618 1583 673" data-label="Section-Header">Video experiences that stand out</div> <div data-bbox="405 716 1925 859" data-label="Text"> <p>Engage your audience with optimal viewing experiences on any screen and increase your content visibility and revenue with Kaltura. Our comprehensive cloud-based solution helps you ingest, manage, publish, distribute, monetize, and analyze your content.</p> </div> <div data-bbox="405 868 1220 902" data-label="Text"> <p>Source: https://corp.kaltura.com/video-platform-for-publishers/</p> </div> <div data-bbox="426 954 1297 1000" data-label="Section-Header">TVOD – Transactional Video on Demand</div> <div data-bbox="426 1031 1917 1326" data-label="Text"> <p>Also known as Pay-Per-View, the TVOD model sells or rents individual videos to customers, just like video stores did in the old times. As a result, it's an excellent model for rights holders looking to sell a specific set of videos – think of a distribution company that wants to sell the rights of its latest blockbuster, for instance. Examples of TVOD models include Amazon Prime Video or Movies on Google Play.</p> </div> <div data-bbox="405 1352 1239 1386" data-label="Text"> <p>Source: https://corp.kaltura.com/blog/avod-svod-tvod-explained/</p> </div>
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	<p>Under the TVOD model two sub-categories can be found:</p> <ul style="list-style-type: none"> • The Electronic Sell-Through (EST), where users pay once to get permanent access to the content. • The Download to Rent (DTR), where viewers spend a lower fee to access content only for a limited time. <p>Source: https://corp.kaltura.com/blog/avod-svod-tvod-explained/</p> <p>Further, to the extent this element is performed at least in part by Defendant’s software source code, Plaintiff shall supplement these contentions pursuant to production of such source code by the Company.</p>
<p>[7.1] receiving a request message including media data indicating requested media content and a consumer device identifier correspondin g to the consumer device;</p>	<p>Company performs and/or induces others to perform the step of receiving a request message including media data indicating requested media content and a consumer device identifier corresponding to the consumer device.</p> <p>This element is infringed literally, or in the alternative, under the doctrine of equivalents.</p> <p>For example, the Kaltura platform allows users to sign up for the platform by creating an account (“consumer device identifier corresponding to the consumer device”) and creating user profiles. Further, when the user searches for a particular video (“media data indicating requested media content”) in a Search Entries field in the Kaltura platform, that the user wishes to rent or purchase, a request is sent to the platform server.</p>

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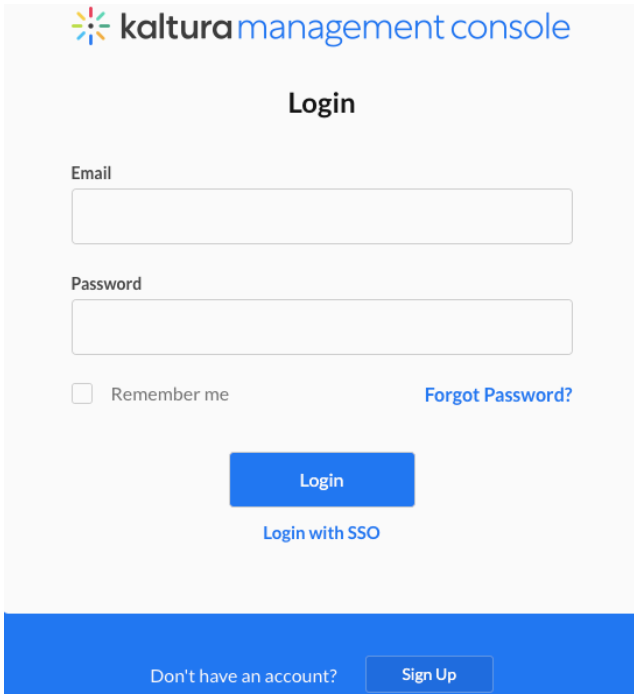
	<div data-bbox="407 266 1037 956"></div> <p data-bbox="407 987 506 1019">Source:</p> <p data-bbox="407 1024 1934 1094">https://kmc.kaltura.com/index.php/kmcng/login?_gl=1*114v0rp*_ga*MjAwNDUzMjg4NC4xNzEwNzM5MjUx*_ga_1JDXRSF4WN*MTcxMDkzMjE4NS41LjEuMTcxMDkzMzY2NS4zOC4wLjA</p>
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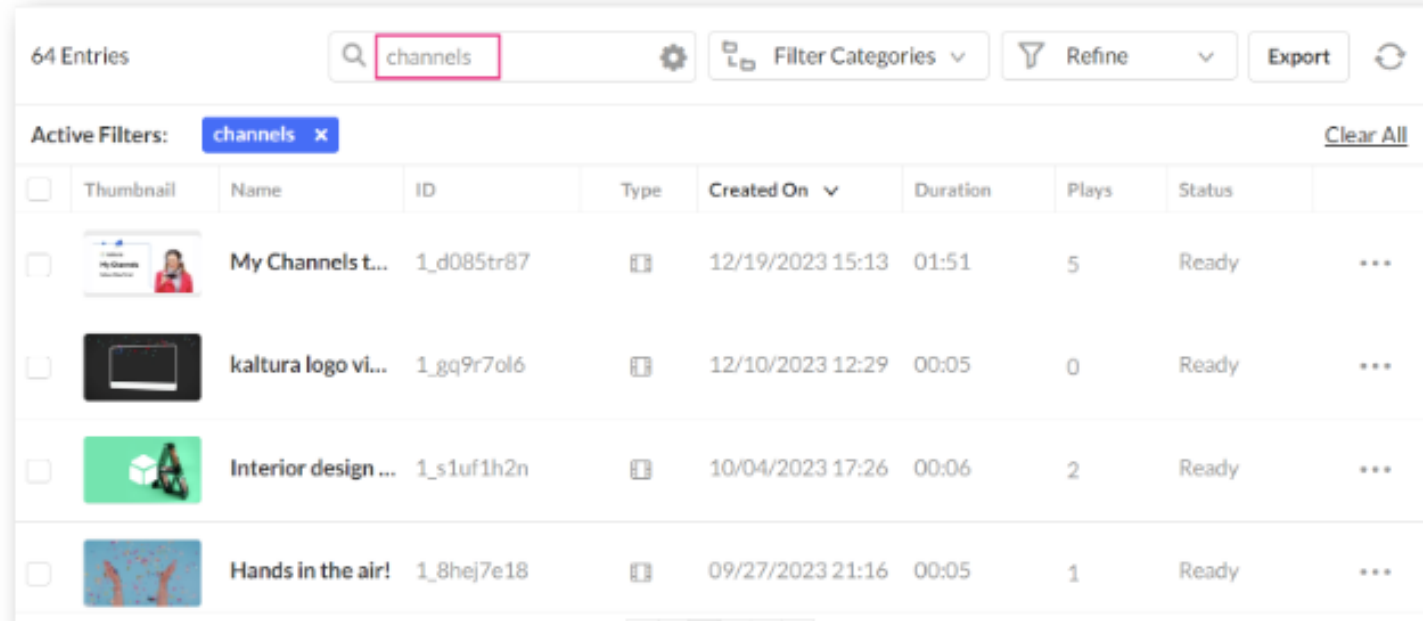
	<div data-bbox="409 267 1262 784"><p>User and device management</p><p>Ensure only authorized users can watch your content. Manage all the household accounts, user profiles, and subscription packages at device-level control in a unified way.</p></div> <p>Source: https://corp.kaltura.com/kaltura-streaming-platform/</p> <p>Use <u>Kaltura's robust search functionality</u> to explore entries on your site. Conduct searches with matching words or phrases, or opt for a more refined approach with advanced search options. Take control of your searches by employing advanced filters and refining options, allowing you to navigate through <u>media based on metadata specifics</u> and free text search.</p> <p>Source: https://knowledge.kaltura.com/help/search-and-filter-media</p>
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Search

1. Enter search terms of your choice in the **Search Entries** field.
2. Press Enter or Return on your keyboard to start the search.



Source: <https://knowledge.kaltura.com/help/search-and-filter-media>

Further, to the extent this element is performed at least in part by Defendant's software source code, Plaintiff shall supplement these contentions pursuant to production of such source code by the Company.

[7.2]
determining
whether the
consumer

Company performs and/or induces others to perform the step of determining whether the consumer device identifier corresponds to a registered consumer device.

This element is infringed literally, or in the alternative, under the doctrine of equivalents.

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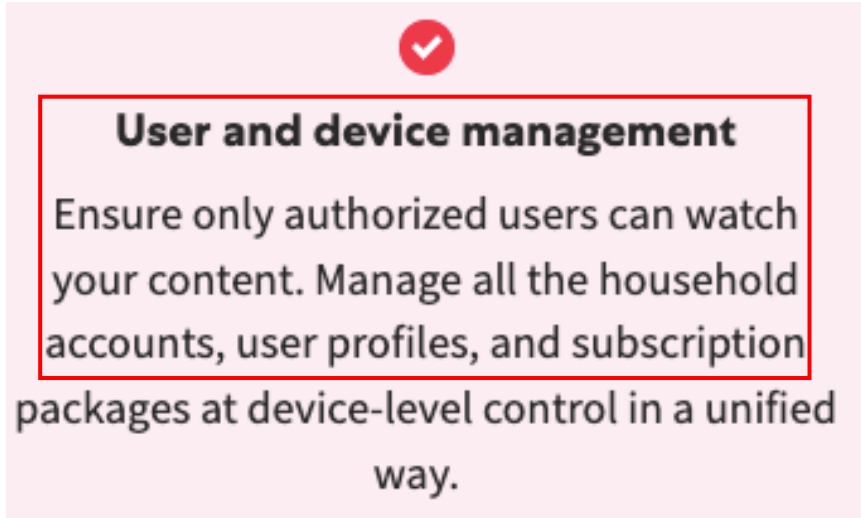
<p>device identifier corresponds to a registered consumer device; and; if it is determined that the consumer device identifier corresponds to the registered consumer device, then:</p>	<p>For example, the Kaltura platform allows only authorized users to watch the content. Further, to rent or purchase a movie, the users sign in with their account credentials ("the consumer device identifier") and make payments according to the required subscription offers such as Electronic Sell-Through (EST) and Download to Rent (DTR). Therefore, it would be apparent to a person having ordinary skill in the art that the platform determines whether the user is registered or not.</p> <div data-bbox="405 443 1260 958">  <p>The screenshot shows a pink background with a red checkmark icon at the top. Below it, a red-bordered box contains the text: "User and device management", "Ensure only authorized users can watch your content. Manage all the household accounts, user profiles, and subscription packages at device-level control in a unified way."</p> </div> <p>Source: https://corp.kaltura.com/kaltura-streaming-platform/</p> <p>Under the TVOD model two sub-categories can be found:</p> <div data-bbox="405 1166 1948 1437"> <ul style="list-style-type: none"> • The Electronic Sell-Through (EST), where users pay once to get permanent access to the content. • The Download to Rent (DTR), where viewers spend a lower fee to access content only for a limited time. </div>
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	<p>Source: https://corp.kaltura.com/blog/avod-svod-tvod-explained/</p> <p>Further, to the extent this element is performed at least in part by Defendant's software source code, Plaintiff shall supplement these contentions pursuant to production of such source code by the Company.</p>
<p>[7.3] determining, whether the request message is one of a storage request message and a content request message; and; if the request message is the storage request message, then determining whether the requested media content is available for storage; and</p>	<p>Company performs and/or induces others to perform the step of determining, whether the request message is one of a storage request message and a content request message; and; if the request message is the storage request message, then determining whether the requested media content is available for storage.</p> <p>This element is infringed literally, or in the alternative, under the doctrine of equivalents.</p> <p>For example, the platform provides an option for publishers and broadcasters to publish ("storage request message"), distribute, monetize, and analyze video content. Further, it provides another option such as Electronic Sell Through and Download to Rent ("content request message") for customers to rent and purchase the video content such that the video is streamed or stored on the customer's device. Since the platform provides storage and content delivery network services, it would be apparent to a person having ordinary skill in the art that the platform determines whether the request message is a storage request message or a content request message.</p> <p>Further, upon information and belief, when the publisher or broadcaster requests to add the video content or publish the content ("if the request message is the storage request message"), the platform determines whether the requested content is available for storage.</p> <p>Video experiences that stand out</p> <p>Engage your audience with optimal viewing experiences on any screen and increase your content visibility and revenue with Kaltura. Our comprehensive cloud-based solution helps you ingest, manage, publish, distribute, monetize, and analyze your content.</p>

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Source: <https://corp.kaltura.com/video-platform-for-publishers/>

High-quality video for live & VOD

Partnering with the world's most prominent brands, Kaltura's video platform helps digital publishers, broadcasters, and media and entertainment companies grow their audience and business at scale.

Kaltura helps you to:

- Add video to your website: on-demand, live, linear channels, or playlists
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- Increase ad viewability and capture every ad impression
- Easily integrate with ad -servers and analytics tools
- Expand your reach with syndication to social networks and more
- Introduce subscription plans to further grow your business
- Engage directly with viewers with your own D2C imprint

Source: <https://corp.kaltura.com/video-platform-for-publishers/>

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	<div data-bbox="716 282 766 331"></div> <div data-bbox="445 355 1029 397">Cloud-based media preparation</div> <div data-bbox="411 427 1071 573">Bulk ingest & upload, fast transcoding, metadata processing, and quick set-up of live streams.</div> <div data-bbox="1503 282 1554 331"></div> <div data-bbox="1224 355 1854 397">Simplified distribution and storage</div> <div data-bbox="1232 427 1843 573">A one-stop-shop for all your video operations, including storage and CDN services.</div> <p data-bbox="411 623 1218 654">Source: https://corp.kaltura.com/video-platform-for-publishers/</p> <p data-bbox="432 738 1293 781">TVOD – Transactional Video on Demand</p> <div data-bbox="428 813 1911 1105"> <p>Also known as Pay-Per-View, the TVOD model sells or rents individual videos to customers, just like video stores did in the old times. As a result, it's an excellent model for rights holders looking to sell a specific set of videos – think of a distribution company that wants to sell the rights of its latest blockbuster, for instance. Examples of TVOD models include Amazon Prime Video or Movies on Google Play.</p> </div> <p data-bbox="411 1130 1236 1161">Source: https://corp.kaltura.com/blog/avod-svod-tvod-explained/</p> <p data-bbox="411 1203 1864 1271">Further, to the extent this element is performed at least in part by Defendant's software source code, Plaintiff shall supplement these contentions pursuant to production of such source code by the Company.</p>
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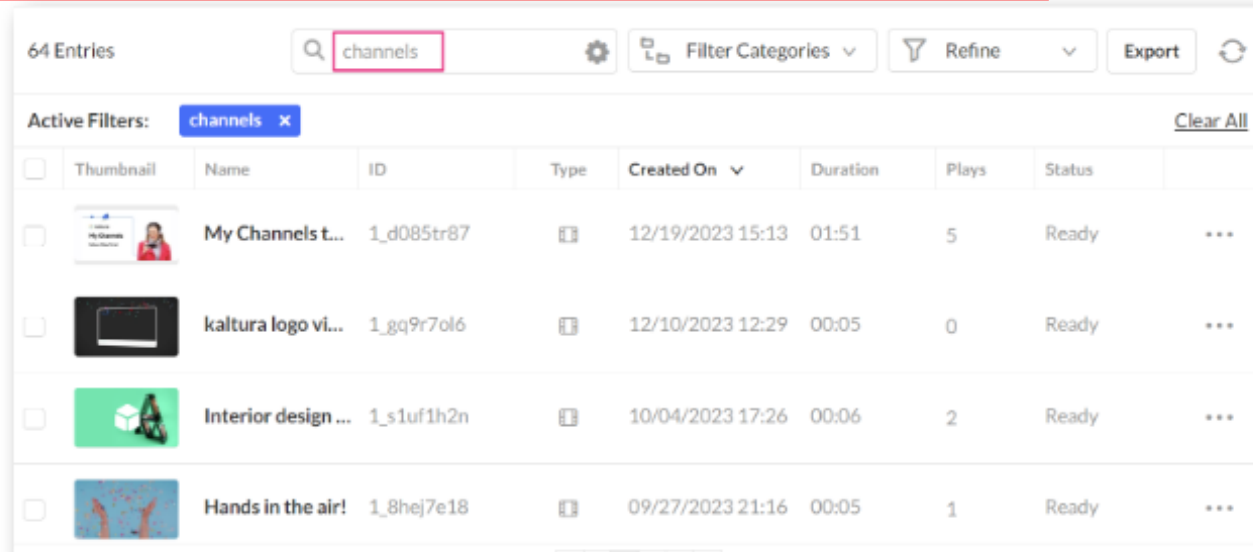
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<p>[7.4] if the request message is the content request message, then initiating delivery of the requested media content to the consumer device;</p>	<p>Company performs and/or induces others to perform the step wherein if the request message is the content request message, then initiating delivery of the requested media content to the consumer device.</p> <p>This element is infringed literally, or in the alternative, under the doctrine of equivalents.</p> <p>For example, the Kaltura platform comprises a Transactional Video-on-demand (TVOD) model, which sells or rents publisher-owned videos to users/customers. When the user chooses one of the options such as Electronic Sell Through and Download to Rent (“content request message”), offered in the TVOD model, the relevant video content is either delivered (“initiating delivery of the requested media content to the consumer device”) permanently or for a limited time.</p> <p>TVOD – Transactional Video on Demand</p> <p>Also known as Pay-Per-View, the TVOD model sells or rents individual videos to customers, just like video stores did in the old times. As a result, it’s an excellent model for rights holders looking to sell a specific set of videos – think of a distribution company that wants to sell the rights of its latest blockbuster, for instance. Examples of TVOD models include Amazon Prime Video or Movies on Google Play.</p> <p>Source: https://corp.kaltura.com/blog/avod-svod-tvod-explained/</p> <p>Under the TVOD model two sub-categories can be found:</p> <ul style="list-style-type: none"> • The Electronic Sell-Through (EST), where users pay once to get permanent access to the content. • The Download to Rent (DTR), where viewers spend a lower fee to access content only for a limited time. <p>Source: https://corp.kaltura.com/blog/avod-svod-tvod-explained/</p>
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Search

1. Enter search terms of your choice in the **Search Entries** field.
2. Press Enter or Return on your keyboard to start the search.



Source: <https://knowledge.kaltura.com/help/search-and-filter-media>

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	<h2>Secured Delivery</h2> <p>Kaltura supports various methods of securing delivery of video streams as follows:</p> <ul style="list-style-type: none">• Progressive download over HTTPS• RTMPE / RTMPTE• Akamai HD Network (chunked/throttled HTTPS)• SWF Verification• IP-linked token authentication <p>The table below shows the stream security techniques as these apply differently across devices:</p> <table><tr><th>Delivery</th><th>Device</th><th>Player Security</th><th>Entitlement</th><th>Encryption</th></tr><tr><td>Akamai HD</td><td>Flash - PC, Android</td><td>SWF verification</td><td>IP based token</td><td>HTTPS</td></tr><tr><td>RTMP</td><td>Flash - PC, Android</td><td>SWF verification</td><td>IP based token</td><td>RTMPE</td></tr><tr><td>Progressive</td><td>All – iOS, Blackberry, Flash, etc.</td><td></td><td>IP based token</td><td>HTTPS</td></tr><tr><td>IOS Streaming (HLS)</td><td>iPhone, iPad</td><td></td><td>IP based token</td><td>HTTPS</td></tr></table> <p>Source: https://developer.kaltura.com/api-docs/VPaaS-API-Getting-Started/Kaltura_API_Authentication_and_Security.html (annotated)</p> <p>Further, to the extent this element is performed at least in part by Defendant’s software source code, Plaintiff shall supplement these contentions pursuant to production of such source code by the Company.</p>	Delivery	Device	Player Security	Entitlement	Encryption	Akamai HD	Flash - PC, Android	SWF verification	IP based token	HTTPS	RTMP	Flash - PC, Android	SWF verification	IP based token	RTMPE	Progressive	All – iOS, Blackberry, Flash, etc.		IP based token	HTTPS	IOS Streaming (HLS)	iPhone, iPad		IP based token	HTTPS
Delivery	Device	Player Security	Entitlement	Encryption																						
Akamai HD	Flash - PC, Android	SWF verification	IP based token	HTTPS																						
RTMP	Flash - PC, Android	SWF verification	IP based token	RTMPE																						
Progressive	All – iOS, Blackberry, Flash, etc.		IP based token	HTTPS																						
IOS Streaming (HLS)	iPhone, iPad		IP based token	HTTPS																						
[7.5] wherein the media data includes time data that indicates a	<p>Company performs and/or induces others to perform the step wherein the media data includes time data that indicates a length of time to store the requested media content.</p> <p>This element is infringed literally, or in the alternative, under the doctrine of equivalents.</p>																									

consumer device

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length of time to store the requested media content; and	<p>For example, the TVOD model provides two sub-categories, such as Electronic Sell-Through (EST) and Download to Rent (DTR) option. Further, when the user selects the DTR option, the video content (“media data”) is requested for a limited time (“length of time”). Therefore, it would be apparent to a person having ordinary skill in the art that the videos requested through the DTR option comprise time data that indicates an amount of time for which the user can access the content (“to store the requested media content”).</p> <p>TVOD – Transactional Video on Demand</p> <p>Also known as Pay-Per-View, the TVOD model sells or rents individual videos to customers, just like video stores did in the old times. As a result, it’s an excellent model for rights holders looking to sell a specific set of videos – think of a distribution company that wants to sell the rights of its latest blockbuster, for instance. Examples of TVOD models include Amazon Prime Video or Movies on Google Play.</p> <p>Source: https://corp.kaltura.com/blog/avod-svod-tvod-explained/</p> <p>Under the TVOD model two sub-categories can be found:</p> <ul style="list-style-type: none"> • The Electronic Sell-Through (EST), where users pay once to get permanent access to the content. • The Download to Rent (DTR), where viewers spend a lower fee to access content only for a limited time. <p>Source: https://corp.kaltura.com/blog/avod-svod-tvod-explained/</p>
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	Further, to the extent this element is performed at least in part by Defendant's software source code, Plaintiff shall supplement these contentions pursuant to production of such source code by the Company.
[7.6] the first processor is further configured to determine whether the requested media content exists; and	<p>Company performs and induces others to perform the step wherein the first processor is further configured to determine whether the requested media content exists.</p> <p>This element is infringed literally, or in the alternative, under the doctrine of equivalents.</p> <p>For example, the Kaltura platform provides a search functionality for users to search and access the content, such that the media content is searched based on metadata specifics and other filters. Therefore, it would be apparent to a person having ordinary skill in the art that the platform comprises a processor that is further configured to determine whether the requested content exists.</p> <p>TVOD – Transactional Video on Demand</p> <p>Also known as Pay-Per-View, the TVOD model sells or rents individual videos to customers, just like video stores did in the old times. As a result, it's an excellent model for rights holders looking to sell a specific set of videos – think of a distribution company that wants to sell the rights of its latest blockbuster, for instance. Examples of TVOD models include Amazon Prime Video or Movies on Google Play.</p> <p>Source: https://corp.kaltura.com/blog/avod-svod-tvod-explained/</p>

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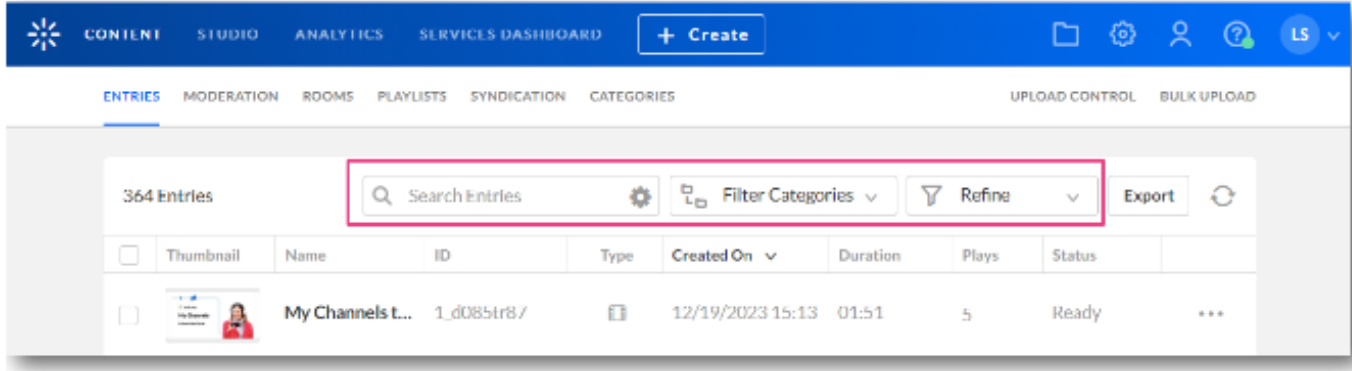
	<p>Use Kaltura's robust search functionality to explore entries on your site. Conduct searches with matching words or phrases, or opt for a more refined approach with advanced search options. Take control of your searches by employing advanced filters and refining options, allowing you to navigate through <u>media</u> based on <u>metadata</u> specifics and free text search.</p>  <p>Source: https://knowledge.kaltura.com/help/search-and-filter-media</p> <p>Further, to the extent this element is performed at least in part by Defendant's software source code, Plaintiff shall supplement these contentions pursuant to production of such source code by the Company.</p>
[7.7] if the processor determines that the requested media content exists, the processor is further configured to	<p>Company performs and induces others to perform the step wherein, if the processor determines that the requested media content exists, the processor is further configured to determine whether the requested media content is available and whether there are restrictions associated with the requested media content that prevent the requested media content from being delivered to the consumer device.</p> <p>This element is infringed literally, or in the alternative, under the doctrine of equivalents.</p> <p>For example, when the users search for a particular video content that exist in the Kaltura platform, the platform determines the options associated with the video content ("to determine whether the requested media content is available") such as Download to Rent and Electronic Sell Through. Further, when the relevant option is selected by the user, the platform checks for conditions including, but not limited to, end user registration for the service offerings,</p>

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<p>determine whether the requested media content is available and whether there are restrictions associated with the requested media content that prevent the requested media content from being delivered to the consumer device.</p>	<p>payment obligations, and validity of payment methods such as credit cards (“restrictions associated with the requested media content”) before delivering the video content to the users (“prevent the requested media content from being delivered to the consumer device”).</p> <p>TVOD – Transactional Video on Demand</p> <p>Also known as Pay-Per-View, the TVOD model sells or rents individual videos to customers, just like video stores did in the old times. As a result, it’s an excellent model for rights holders looking to sell a specific set of videos – think of a distribution company that wants to sell the rights of its latest blockbuster, for instance. Examples of TVOD models include Amazon Prime Video or Movies on Google Play.</p> <p>Source: https://corp.kaltura.com/blog/avod-svod-tvod-explained/</p> <p>Under the TVOD model two sub-categories can be found:</p> <ul style="list-style-type: none"> • The Electronic Sell-Through (EST), where users pay once to get permanent access to the content. • The Download to Rent (DTR), where viewers spend a lower fee to access content only for a limited time. <p>Source: https://corp.kaltura.com/blog/avod-svod-tvod-explained/</p>
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	<p><i>6. Temporary Suspension.</i></p> <p>6.1 Generally. We may suspend your or any End User's right to access or use any portion or all of the Service Offerings immediately upon notice to you if we determine:</p> <p>(a) your or an End User's use of or registration for the Service Offerings (i) poses a security risk to the Service Offerings or any third party, (ii) may adversely impact the Service Offerings or the systems or Content of Kaltura or any other Kaltura customer, (iii) may subject us, our affiliates, or any third party to liability, or (iv) may be fraudulent;</p> <p>(b) you are, or any End User is, in breach of this Agreement, including if you are delinquent on your payment obligations for more than 15 days;</p> <p>(c) the credit card you authorized us to charge in connection with your account is invalid or otherwise unavailable for the processing of payments; or</p> <p>(d) you have ceased to operate in the ordinary course, made an assignment for the benefit of creditors or similar disposition of your assets, or become the subject of any bankruptcy, reorganization, liquidation, dissolution or similar proceeding.</p> <p>Source: https://corp.kaltura.com/legal/tos/customer-agreement/</p> <p>Further, to the extent this element is performed at least in part by Defendant's software source code, Plaintiff shall supplement these contentions pursuant to production of such source code by the Company.</p>
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2. List of References

1. <https://corp.kaltura.com/>, last accessed on 20 March, 2024.
2. <https://corp.kaltura.com/blog/avod-svod-tvod-explained/> , last accessed on 20 March, 2024.
3. https://developer.kaltura.com/api-docs/VPaaS-API-Getting-Started/Kaltura_API_Authentication_and_Security.html , last accessed on 20 March, 2024.
4. <https://knowledge.kaltura.com/help/introducing-the-kmc> , last accessed on 20 March, 2024.
5. <https://corp.kaltura.com/blog/vod-streaming/> , last accessed on 20 March, 2024.